UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

TV Tokyo Corporation)
	Plaintiff,)) Case No. 23-cv-3091
	v.) Judge: Hon. Rebecca R. Pallmeyer
THE INDIVIDUALS,)
CORPORATIONS, LIMITED)
LIABILITY COMPANIES,)
PARTNERSHIPS and)
UNINCORPORATED)
ASSOCIATIONS IDENTIFIED)
ON SCHEDULE "A,"	Defendants.)

Declaration of Chenhui Zhang

- I, Chenhui Zhang, of the City of Shenzhen, China, declare as follows:
- 1. I am over eighteen (18) years of age. I have never been convicted of a felony or any criminal offense involving moral turpitude, and I am fully competent to testify to the matters stated herein. I have personal knowledge of every statement made in this Declaration and such statements are true and correct.
- 2. I am a manager supervising the operations of the Walmart store Srliya, Walmart seller ID 10001127694 (the "Store"). I have access and control of the Store.
- 3. The Store is not associated or co-operated with any other defendants in this case.
- 4. The Store solely operates at address in China. The Store has never owned, leased, or utilized an office in Illinois. The Store has never been liable to the Illinois tax jurisdiction. The Store never advertised, held telephone listing, or maintained bank account in Illinois, and has no agents, employees, or contractors in Illinois.
- 5. After a diligent search of sale record and to the best of my knowledge, the Store sold 1 item of the accused product for \$26.61, and no item was shipped to the State of Illinois. Attached

as Exhibit 1 is a complete sale record of the accused product.

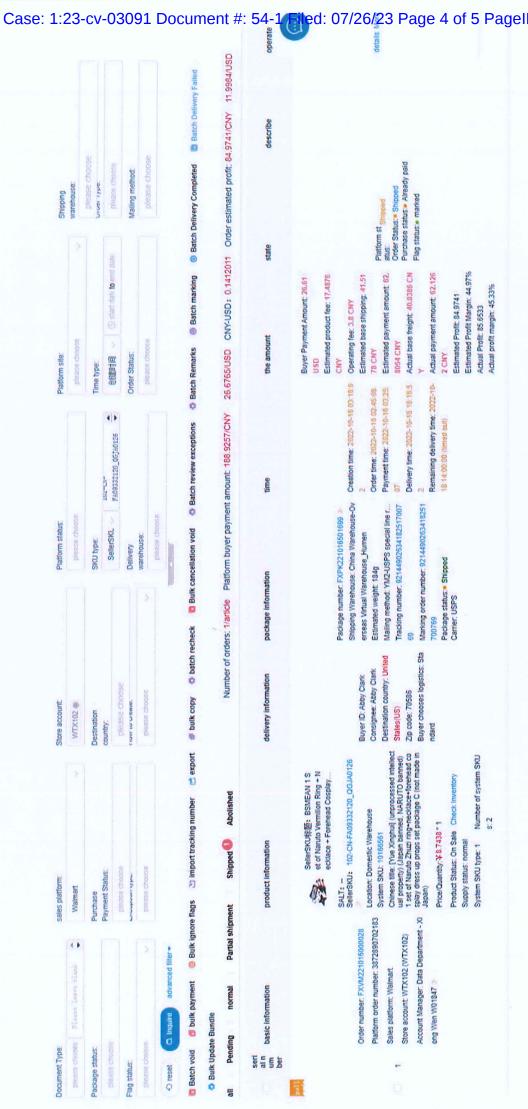
I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this July 16, 2023 in Shenzhen, China.

Chenhui Zhang
Chenhui Zhang

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Exhibit 1



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